



www.ams-earthmovers.com  
contact@ams-earthmovers.com  
A “No Surprises” approach to business.

10/28/10

Mr. Russell Golden, Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 0686-5116

VIA: E-Mail [director@FASB.org](mailto:director@FASB.org)

Re: file reference #1840-100  
Disclosure of certain Loss Contingencies

Dear Mr. Golden,

I appreciate the opportunity to provide comments to the proposed amendments for certain loss contingencies from withdrawal from a multi employer defined benefit pension plan.

AMS Earth Movers, Inc is opposed to the changes for the following reasons:

We are a construction company servicing the Chicago area and surrounding counties. We are signatory to a collective bargaining agreement which provides for retirement benefits from a defined benefit pension plan.

We strongly believe any changes made to the reporting standard should only apply to a company that has decided to withdraw from such a plan. Changing the reporting standards for the thousands of companies who have no intention of withdrawing from such a plan would result in a negative outlook and potentially misinformation on one's financial statement.

The unreliability of the information you are requesting, I believe will negatively impact companies who have no intention of going out of business or withdrawing from their current collective bargaining agreement.

Specifically, these changes would impact a company's potential net worth, have a negative effect on a contractor's bonding capability, have an adverse effect on investors wishing to purchase a company signatory to a collective bargaining agreement, etc.

I respectfully submit that the proposed changes are hypothetical in nature, and I see no positive results arising from the proposed changes and therefore we strongly suggest you withdraw the proposed changes, and therefore we strongly suggest you withdraw the proposed amendment change.

Sincerely,

Julie Savitt  
President,  
AMS Earth Movers, Inc

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The following have submitted the exact same comment letter as the one shown.

AMS EARTH MOVERS INC.

JULIE SAVITT

PCI FLORTECH INC.

MICHAEL A. O'CONNELL

NESLUND & ASSOCIATES INC.

JOHN J. SCAPIN

CABO CONSTRUCTION CORP.

FRANK CABELLO

BOURBON TILE & MARBLE, INC.

NANCY E. BOURBON

CONSTRUCTION MATERIALS & SUPPLY RESOURCES LLC MARY ANN LAFLER

GARRIGAN CONSTRUCTION INC.

ROSEMARY HEPNER

CHRISTY WEBBER LANDSCAPES

ALLIANCE CONTRACTORS INC.

CHARLES W. RUTH